

**Federal Defenders
OF NEW YORK, INC.**

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April 21, 2023

BY ECF

The Honorable Judge Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Lucha El
22 Cr. 644 (JSR)

Honorable Judge Rakoff:

With the consent of the Government and the Pretrial Services Agency, I write to request that Lucha El be permitted to travel to the District of Massachusetts from Sunday, April 23 to Monday, April 24 for the purposes of attending a court appearance.

As the Court is aware, Lucha El has a pending case in Middlesex County Superior Court in Woburn, Massachusetts. His next Court appearance is April 24, 2023, at 9:00 A.M. Lucha El's conditions of release permit his travel to the District of Massachusetts for court appearances; however, it is Pretrial's position that any overnight travel, even for the purpose of court appearances, must be approved in advance by this Court. Given the distance between Lucha El's home in the Bronx, and the courthouse in Woburn, MA, I request that he be permitted to travel to Massachusetts on Sunday night, returning on Monday after his court appearance.

As noted above, Pretrial does not oppose this request but asks that Lucha El provide Pretrial with his travel details and itinerary in advance. The Government consents to this request.

Thank you for your consideration of this request.

*Sgt Ordered
Jed Rakoff 4/21/23
U. S. D. J.*

Respectfully submitted,

/s/ Zawadi Baharanyi

Zawadi Baharanyi
Assistant Federal Defender

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cc: Ashley Nicolas, Assistant U.S. Attorney.